



# CITY OF PORTLAND, OREGON BUREAU OF PLANNING

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December 17, 2001

Mathew Cusma, Environmental Administrator  
Crawford Street Corporation  
P.O. Box 10047  
Portland, OR 97296-0047

Re: Crawford Street Corporation/Draft Willamette River Inventory

Dear Mr. Crawford.

Thank you very much for taking the time to submit detailed comments expressing your concerns about the identification of habitat on the Crawford Street property (8524 WI/N Crawford St.-R739101320). In reading your comments, two main themes emerged:

- Protection and Conservation Approach: In regards to prioritization of sites for habitat improvements you advocate, "Protecting and preserving the best quality habitat available." Concerns about the costs and benefits involved in improving habitat in already degraded areas were also expressed.
- Quality of Habitat: You suggest that the site has limited value as a habitat site because of several attributes that diminish its importance, including its location in an industrial area; rubble and pilings along the shoreline; proximity to outfalls, a Superfund site, and the composition of fill at the site; and fragmentation and edge effect related competition, predation, and parasitism. You add that these attributes may be an attractive nuisance that could expose wildlife to increased competition, predation, and contamination.

Protection and Conservation Approach:

We agree with the "protect the best quality habitat available" approach. However, the revised inventory document will not make recommendations regarding habitat protection and restoration nor will it reach conclusions regarding Goal 5 significance. It will be limited to the identification and assessment of the quantity, quality, and location of natural resources. The determination of significance and the development of approaches to protect, preserve, and restore those areas will occur later and will include many additional opportunities for public input.

Quality of Habitat:

As you noted, the draft inventory report does note the somewhat limited value of the existing conditions at the site and you suggest this is a reason to remove the site from the inventory. The following section will respond to specific concerns cited in your letter regarding removal of the site from the inventory.

*Location in industrial segment:* You conclude that the conditions in the North and South segments have greater value to fish and wildlife and therefore should be the focus of protection and preservation measures. Again, we are not at the stage of recommending protection measures so they will not be included in the final inventory report. Although the North and South segments do have the highest quality resource sites, it is still important to consider all resources. The fact that fish and wildlife are using sites within the Downtown and Industrial segments reinforces the need to identify any existing habitat areas in these segments and provide an accurate description of their quality and location.



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*Proximity to contaminants:* Sewer and stormwater outfalls, a Superfund site, and fill of unknown origin are present within the Willamette Cove site. Exposure of wildlife to toxic materials is also a concern for the City. The presence of contaminants is noted as a limiting factor in the draft inventory; a reference to outfalls will be added. Any additional information you can provide to improve the accuracy of the inventory report would be appreciated.

*Fragmentation and edge effect:* I agree that large patches provide better habitat than small patches. However, small patches can also provide positive benefits: refugia for unique vegetation; migration corridors for fish, wildlife, and plants (i.e. seed distribution); connections with other habitat areas; feeding opportunities for generalist and edge species. It is my opinion that patch size should not preclude an area from inclusion in the inventory, instead it should be included as part of a site assessment.

Removal of site from inventory and atlas:

You have requested "that the significant wildlife value designation be lifted" from the property. I want to clarify that the identification of habitat and findings of significance are discrete classifications. The *Willamette River Inventory: Natural Resources* identifies quantity, quality, and location of resources and does not designate significance.

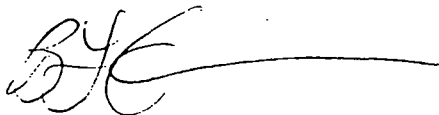
Willamette Cove, the beach area and associated vegetation do constitute a habitat area, and the site, including the portion of the Crawford Street property, should be included in the inventory. The inventory report will be amended to include details from your letter clarifying the quality of the site. In addition, the final report will be limited to describing the site and will not include conclusions regarding prioritization or restoration opportunities.

As we move into phases of this project considering the significance of the resource area and appropriate conservation measures, the information you have provided will inform the discussion and help us reach a more appropriate outcome. I hope that you will participate in that process. You have been added to our mailing list and will receive notification of events, the release of the next inventory draft, and any opportunities to comment.

In regards to the Willamette River Atlas, no reprint of the Atlas is anticipated at this time. However, using an errata sheet, we will clarify that the habitat sites indicated on Map 2: Natural Resources are based on draft information and do not indicate restoration priority or the application of protective regulations. The errata sheet will be provided to anyone who picks up a copy of the atlas, and mailed to anyone who has already received the atlas (provided we have their address).

If you have additional questions or concerns, please feel free to contact me.

Sincerely,



Barb Grover, City Planner  
(503) 823-6949

cc: Ann Gardner, Schnitzer Investment Corp.